

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
*Plaintiff,*

**NOTICE OF MOTION  
TO MODIFY CONDITIONS  
OF RELEASE**

vs.

Case No: 22-CR-00042-JLS

JOHN L. HUTCHINS,  
*Defendant.*

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S I R S :

COMES NOW the defendant, JOHN HUTCHINS, by and through his attorneys, LIPSITZ GREEN SCIME CAMBRIA LLP, PAUL J. CAMBRIA, ESQ. and JUSTIN D. GINTER, ESQ., and upon the annexed affidavit of Justin D. Ginter, Esq., hereby moves this Court for the relief requested in this motion to modify Mr. Hutchins's conditions of release pursuant to 18 U.S.C. §§ 3142(c)(3).

DATED: Buffalo, New York  
April 25, 2022

Respectfully submitted,

PAUL J. CAMBRIA, ESQ.  
JUSTIN D. GINTER, ESQ.  
LIPSITZ GREEN SCIME CAMBRIA LLP  
*Attorneys for Defendant, JOHN HUTCHINS*  
42 Delaware Avenue  
Buffalo, New York 14202  
(716) 849-1333  
pcambria@lglaw.com  
jginter@lglaw.com

TO: PAUL BONANNO, ESQ.  
ASSISTANT UNITED STATES ATTORNEY  
138 Delaware Avenue  
Buffalo, New York 14202

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
*Plaintiff,*

Vs.

JOHN L. HUTCHINS,  
*Defendant.*

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**AFFIDAVIT**  
Case No: 22-CR-00042-JLS

STATE OF NEW YORK     )  
COUNTY OF ERIE        )ss  
CITY OF BUFFALO        )

JUSTIN D. GINTER, ESQ. being duly sworn, deposes and says:

1. I, along with Paul J. Cambria, Esq. represent the defendant, JOHN HUTCHINS.
2. I am fully familiar with the facts and circumstances surrounding this case through my investigation of this matter and review of the pleadings previously filed, as well as my conversations with the defendant.
3. This affidavit is made in support of defendant's motion to modify his conditions of release.
4. On March 29, 2022, Mr. Hutchins was arraigned and released under a number of conditions. One of those conditions is that Mr. Hutchins shall not transfer any assets while this case is pending without Court permission.
5. Mr. Hutchins owns a condominium located in Hollybrook Golf and Tennis Club at 9200 North Hollybrook Drive, Apt. 8, Building 110 in Pembroke Pines, Florida 33025. Respectfully we are requesting that this condition be modified so that Mr. Hutchins may list for sale and ultimately sell the condo referenced above.

6. Defense counsel has contacted United States Attorney, Paul Bonanno, who has no objection to this request.

7. Defense counsel has also contacted United States Probation Officer, Brian Mamizuka, who has no objection to this request.

WHEREFORE, for the reasons set forth above, Defendant Hutchins respectfully asks that this Court to modify his conditions of release so that he may refinance his mortgage.

Respectfully submitted,

/s/Justin D. Ginter  
JUSTIN D. GINTER, ESQ.  
LIPSITZ GREEN SCIME CAMBRIA  
Attorneys for Defendant  
JOHN HUTCHINS  
42 Delaware Avenue  
Buffalo, New York 14202  
(716) 849-1333  
jginter@lglaw.com

Subscribed and sworn to before me this  
25th day of April, 2022.

/s/Alexander E. Basinski  
Notary Public, State of New York  
Qualified in Erie County  
My Commission Expires August 6, 2022